

Stephen E. Hessler (admitted *pro hac vice*)  
Patrick Evans (admitted *pro hac vice*)  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900

- and -

Michael A. Condyles (VA 27807)  
Peter J. Barrett (VA 46179)  
Jeremy S. Williams (VA 77469)  
KUTAK ROCK LLP  
Bank of America Center  
1111 East Main Street, Suite 800  
Richmond, Virginia 23219-3500  
Telephone: (804) 644-1700  
Facsimile: (804) 783-6192

James H. M. Sprayregen, P.C.  
Ross M. Kwasteniet (admitted *pro hac vice*)  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

*Proposed Counsel for the Debtors and  
Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

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In re:	)	
	)	Chapter 11
	)	
PATRIOT COAL CORPORATION, <u>et al.</u> ,	)	Case No. 15-32450 (KLP)
	)	
Debtors.	)	(Jointly Administered)
	)	

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**NOTICE OF MOTION AND NOTICE OF HEARING ON DEBTORS' MOTION FOR ENTRY OF (I) AN ORDER (A) APPROVING BIDDING PROCEDURES AND BID PROTECTIONS IN CONNECTION WITH THE SALES OF CERTAIN OF THE DEBTORS' ASSETS, (B) APPROVING THE FORM AND MANNER OF NOTICE, (C) SCHEDULING AUCTIONS AND A SALE HEARING, (D) APPROVING PROCEDURES FOR THE ASSUMPTION AND ASSIGNMENT OF CONTRACTS, AND (E) GRANTING RELATED RELIEF AND (II) AN ORDER (A) APPROVING THE SALE OF ASSETS PURSUANT TO THE BIDDING PROCEDURES, (B) AUTHORIZING THE SALE OF ASSETS FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS, (C) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF CONTRACTS, AND (D) GRANTING RELATED RELIEF**

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**PLEASE TAKE NOTICE THAT** Patriot Coal Corporation and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”) have filed with the Court the *Debtors' Motion for Entry of (I) an Order (A) Approving Bidding Procedures and Bid*

*Protections in Connection With the Sales of Certain of the Debtors' Assets, (B) Approving the Form and Manner of Notice, (C) Scheduling Auctions and a Sale Hearing, (D) Approving Procedures for the Assumption and Assignment of Contracts, and (E) Granting Related Relief and (II) An Order (A) Approving the Sale of Assets Pursuant to the Bidding Procedures, (B) Authorizing the Sale of Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (C) Authorizing the Assumption and Assignment of Contracts, and (D) Granting Related Relief*  
[Docket No. 200]

**PLEASE TAKE FURTHER NOTICE THAT your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

**PLEASE TAKE FURTHER NOTICE THAT** in connection with the chapter 11 cases, an Order (I) Establishing Certain Notice, Case Management and Administrative Procedures (II) Granting Related Relief [Docket No. 79] (the “Case Management Order”) was entered by the Court on May 14, 2015, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained at no charge at <https://cases.primeclerk.com/patriotcoal/> or for a fee via PACER at [www.vaeb.uscourts.gov/](http://www.vaeb.uscourts.gov/).

**PLEASE TAKE FURTHER NOTICE THAT** if you do not timely file and serve a written objection to the relief requested in the Motion, the Court may deem any opposition waived, treat the Motions as conceded and enter an order granting the relief requested in the Motions without further notice or a hearing.

**PLEASE TAKE FURTHER NOTICE THAT** in accordance with the Case Management Order, if you wish to oppose the Motions, **on or before 4:00 p.m. prevailing**

**Eastern Time on June 16, 2015, or such shorter time as the Court may hereafter order, and of which you may receive subsequent notice, (the “Objection Deadline”),** you must file with the Court, at the address shown below, a written objection pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order:

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, Virginia 23219

**PLEASE TAKE FURTHER NOTICE THAT** in accordance with the Case Management Order, you must also serve a copy of your written objection on the Core Group, the 2002 List and the Affected Entities, as such terms are defined in the Case Management Order, **on or before the Objection Deadline.**

**PLEASE TAKE FURTHER NOTICE THAT** the Motions are scheduled to be heard before the Court on the Omnibus Hearing date scheduled for **June 23, 2015 at 1:00 p.m.** prevailing Eastern Time, in the United States Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, Virginia 23219. If you fail to file timely a written response and to attend the hearing even if a response is timely filed, the Court may consider any objection you may have waived and enter an order granting the relief requested.

**PLEASE TAKE FURTHER NOTICE THAT** you should consult the Case Management Order before filing any written objection to the Motions.

*[Remainder of Page Intentionally Left Blank]*

Dated: June 4, 2015  
Richmond, Virginia

Respectfully submitted,

/s/ Michael A. Condyles

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Michael A. Condyles (VA 27807)

Peter J. Barrett (VA 46179)

Jeremy S. Williams (VA 77469)

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Bank of America Center

1111 East Main Street, Suite 800

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Telephone: (804) 644-1700

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